

BRIAN J. STRETCH (CABN 163973)
Acting United States Attorney

DAVID R. CALLAWAY (CABN 121782)
Chief, Criminal Division

LLOYD FARNHAM (CABN 202231)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-6973
Facsimile: (415) 436-7027
lloyd.farnham@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

ABDULKARIM HASSAN ABDI,

Defendant.

CASE NO. 3:15-CR-0301 WHA

**STIPULATION AND ~~[PROPOSED]~~ ORDER
EXCLUDING TIME UNDER THE
SPEEDY TRIAL ACT FROM OCTOBER 20,
2015 TO NOVEMBER 10, 2015**

On October 20, 2015, defendant Abdulkarim Hassan Abdi appeared before this Court. At the hearing, the Court directed the parties to appear on November 10, 2015, for a further status conference, change or plea, or trial setting. The parties agree that the defendant's counsel requires additional time to investigate and advise the defendant regarding the immigration consequences related to this case, to review discovery provided by the government, and to prepare and discuss the case with the defendant with the assistance of a Somali interpreter, and the parties agree that the additional time is necessary for effective preparation. Therefore, the parties agree and jointly request that the time between October 20,

STIPULATION AND ~~PROPOSED~~ ORDER
CASE NO. 3:15-CR-0301 WHA

2015 and November 10, 2015 should be excluded in order to ensure reasonable time necessary for the effective preparation of counsel pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

DATED: October 20, 2015

Respectfully Submitted,

BRIAN J. STRETCH
Acting United States Attorney

/s/ Lloyd Farnham
LLOYD FARNHAM
Assistant United States Attorney

OFFICE OF THE FEDERAL
PUBLIC DEFENDER


/s/ Ellen Leonida
ELLEN LEONIDA
Attorney for Defendant Abdulkarim Hassan Abdi

[PROPOSED] ORDER

For the reasons stated above, the Court finds that the exclusion of time from October 20, 2015, through and including November 10, 2015, is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The failure to grant the requested continuance would deny the defendant effective preparation of counsel, and would result in a miscarriage of justice. 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: October 26, 2015.


HON. WILLIAM ALSUP
United States District Court Judge